

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

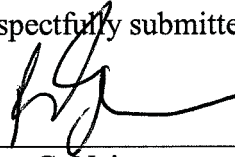
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UNITED STATES OF AMERICA,)
)
Plaintiff,)
- v. -) 12 Civ. 2600 (GBD)
)
A 10th CENTURY CAMBODIAN SANDSTONE)
SCULPTURE, CURRENTLY LOCATED AT)
SOTHEBY'S IN NEW YORK, NEW YORK,)
)
Defendant in rem.	
-----	X

CLAIMANTS' NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Claimants' Motion to Dismiss and all other papers herein, claimants Sotheby's, Inc. and Ms. Ruspoli di Poggio Suasa, by and through their undersigned counsel, will move this Court, before the Honorable George B. Daniels, at the Daniel Patrick Moynihan United States Courthouse located at 500 Pearl Street, New York, New York 10007 at a date and time to be determined by the Court, for an order, pursuant to Supplemental Rule for Admiralty or Maritime Claims and Asset Forfeiture Actions G(8)(b)(i) and Federal Rule of Civil Procedure 12(b)(6), dismissing with prejudice all claims in the Complaint against the defendant in rem. The basis for this motion is set forth in the accompanying Memorandum of Law, the Declaration of Peter G. Neiman, Declaration of Brian Doctor QC, and the exhibits thereto.

Dated: New York, New York
June 5, 2012

Respectfully submitted,




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*Counsel for Claimants Sotheby's, Inc. and Ms.
Ruspoli di Poggio Suasa*

CERTIFICATE OF SERVICE

I, Peter G. Neiman, one of the attorneys for claimants Sotheby's, Inc. and Ms. Ruspoli di Poggio Suasa, hereby certify that on June 5, 2012, I caused the foregoing (i) Notice of Motion; (ii) Memorandum of Law in Support of Claimants' Motion to Dismiss; (iii) the Declaration of Peter G. Neiman in Support of Claimants' Motion to Dismiss; and (iv) the Declaration of Brian Doctor QC to be served on plaintiff's counsel by email and through Electronic Case Filing, pursuant to Civil Rule 5.2 of the Local Rules of the United States District Court for the Southern District of New York.



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